

# Test Valley Borough Council Consultation for Local Plan 2040 Regulation 18 Stage 2

## COMMENTS FORM

Test Valley Borough Council has published its Local Plan 2040 Regulation 18 Stage 2 document for public consultation. This consultation document sets out a vision for Test Valley up to 2040, objectives for achieving this vision, our development needs alongside allocations for residential and employment development and theme-based policies.

The consultation period runs from Tuesday 6<sup>th</sup> February to noon on Tuesday 2<sup>nd</sup> April 2024. Please respond before the close of the consultation period so that your comments may be taken into account.

You can respond to our consultation by filling out the form below. This form has two parts:

Part A: Your Details

Part B: Your Comments (please fill in a separate sheet for each comment you wish to make)

Further information can be found on our website at:

[www.testvalley.gov.uk/localplan2040](http://www.testvalley.gov.uk/localplan2040)

Once the form has been completed, please send to [planningpolicy@testvalley.gov.uk](mailto:planningpolicy@testvalley.gov.uk) below by **noon on Tuesday 2<sup>nd</sup> April 2024**.

Following receipt of your comments from, we will keep you informed of future consultation stages unless you advise us that you want to opt out of such communication.

If you are unable to send via email, please send a postal copy to our address below.

### Contacting us

Planning Policy and Economic Development Service  
Test Valley Borough Council  
Beech Hurst  
Weyhill Road  
Andover  
SP10 3AJ

Tel: 01264 368000

Website: [www.testvalley.gov.uk/localplan2040](http://www.testvalley.gov.uk/localplan2040)

Email: [planningpolicy@testvalley.gov.uk](mailto:planningpolicy@testvalley.gov.uk)

## Part A: Your Details

Please fill in all boxes marked with an \*

Title* Mr/Mrs/Miss/Ms/Dr/Other (please state)	Miss	First Name*	Katherine
Surname*	Miles		
Organisation* (If responding on behalf of an organisation)	Pro Vision		

Please provide your email address below:

Email Address*	
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Alternatively, if you don't have an email address please provide your postal address.

Address*			
		Postcode	

If you are an agent or responding on behalf of another party, please give the name/ company/ organisation you are representing:

Cambium Developments Ltd
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### Personal Details and General Data Protection Regulation

Please note that representations cannot be treated as confidential. If you are responding as an individual, rather than as an organisation, we will not publish your contact details (email/ postal address and telephone number) or signatures online, however the original representations will be available for public viewing at our offices by prior appointment.

All representations and related documents will be held by the Council until the Local Plan 2040 is adopted and the Judicial Review period has closed and will then be securely destroyed.

The Council respects your privacy and is committed to protecting your personal data. Further details on the General Data Protection Regulation and Privacy Notices are

available on our website here:  
<http://www.testvalley.gov.uk/aboutyourcouncil/accesstoinformation/gdpr>

## Part B: Your Comments

Please use the boxes below to state your comments. This includes one box for general comments and another for specific comments related to an area of the Local Plan.

Insert any general comments you may have that do not relate to a specific paragraph number or policy in the general comments box below.

If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording.

If you are commenting on a document supporting the draft Local Plan (such as a topic paper, or the Sustainability Appraisal), please indicate so.

General
Please refer to separate representations.

For specific comments, please make it clear which paragraph, policy or matter your comments relate to where possible. Please use the box below.

If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording.

Paragraph Ref	Specific Comments
	<p>Please refer to separate representations, however in summary, we consider that modifications to the plan are necessary to make the eLP sound. These include:</p> <ul style="list-style-type: none"><li>• Extending the plan period to at least 2041 to meet the requirement of the Framework;</li><li>• Uplifting the housing requirement by at least 550dpa to accommodate the additional 1 year to 2041;</li><li>• Reviewing the SHMA evidence in respect of affordable housing need in line with the Framework and uplifting the housing requirement to 730dpa;</li><li>• Reviewing the settlement hierarchy, and classifying Fyfield as a Tier 3 Settlement;</li><li>• Allocating the land at The Wayne for residential development of c. 70 dwellings to be delivered in phases.</li></ul>

### What happens next?

All valid responses received within the consultation period will be acknowledged and you will be given a reference number. Please quote this reference number when contacting the Council about the Local Plan 2040. If you have an agent acting on your behalf, correspondence will be sent directly to your agent.

All responses received will be taken into account as part of the preparation of the Local Plan 2040.

**DRAFT TEST VALLEY LOCAL PLAN 2040  
REGULATION 18 STAGE 2 CONSULTATION  
LAND TO THE REAR OF THE WAYNE, FYFIELD.**

Representations prepared by Pro Vision on behalf of Cambium Developments Ltd

April 2024

LAND TO THE REAR OF THE WAYNE, FYFIELD.

DRAFT TEST VALLEY LOCAL PLAN 2040 REGULATION 18 STAGE 2 CONSULTATION

PROJECT NO. 51534

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**DATE:**

APRIL 2024

PRO VISION

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## APPENDICES

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## 1.0 Introduction

- 1.1 These representations have been prepared by Pro Vision on behalf of Cambium Developments Ltd in response to the consultation on the *'Draft Test Valley Local Plan 2040 Regulation 18 Stage 2'*.
- 1.2 This representation is supported by the Test Valley Borough Council Local Plan comments form.
- 1.3 Our client is promoting land to the rear of The Wayne, Fyfield as shown in SHELAA 2023 Site 219). Our client considers that Fyfield, which has been categorised as a Tier 4 settlement, is in fact suitable for development and should be recognised as such in the Local Plan. Our client therefore welcomes the opportunity to be involved in and make representations on the draft Local Plan.



## 2.0 Comments on Draft Test Valley Local Plan 2040 Regulation 18 Stage 2 ('the eLP')

### The Plan Period

2.1 The proposed plan period is 2020 – 2040. Paragraph 1.56 of the eLP states that “*We will be consulting on our Local Plan 2040 Regulation 19 by the end of Q1 2025*”. This is consistent with the recently Local Development Scheme ('LDS') which was published in November 2023. The LDS envisages that Adoption of the plan will be Q2 of 2026.

2.2 Therefore, as currently prepared, the Regulation 18 eLP fails to accord with the National Planning Policy Framework at Paragraph 22 which requires:

*“Strategic policies should look ahead over a minimum 15 year period from adoption to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure”.*

2.3 We consider the Plan Period should be revised to at least 2041 to ensure the minimum 15-year requirement is met in line with the Framework. Without this amendment, the eLP cannot be deemed “positively prepared” as required by Paragraph 35 of the Framework.

2.4 The eLP is proposing to deliver 11,000 homes over the plan-period to 2040 which equates to 550dpa. It is considered that as a minimum, this should be increased to 11,550 to reflect the required 15 year minimum plan period from adoption.

### Housing Need

2.5 Paragraphs 60, 61 and 63 of the Framework require planning policies to significantly boost the supply of homes. Further Planning Policies should consider the needs of specific groups. The 550dpa figure adopted by the Council is derived from the Governments Standard Method for Assessing Local Housing Need and is reflective of the minimum number of homes needed. However, this figure is not reflective of the needs for specific groups, such as those who require affordable housing.

2.6 The Council's own evidence shows (the 2022 SHMA) that there is a need for 652 affordable homes per annum, of which 437dpa should be rented and 215dpa should be affordable home ownership. Figure 5.18 of the SHMA indicates that, once estimates of those in need currently

in assisted accommodation are discounted there is an “*affordable need for 292 homes per annum*”.

- 2.7 Taking the 292dpa at face value, this equates to an annual requirement of 730dpa. This is based on the policy requirement for 40% affordable homes from market housing developments. This would suggest that the Council should be planning for at least 14,600 homes, split 8,920 in NTV and 5,680 in STV (maintaining the proportions of the eLP).
- 2.8 The eLP should be revised to include additional site allocations to meet local needs including for affordable housing.

#### Settlement Hierarchy

- 2.9 Fyfield is regarded as a Tier 4 Settlement. However we consider the assessment at Table 7 of the Settlement Hierarchy Topic Paper has missed a few key facilities:
- Primary School – The Kimpton, Thruxton and Fyfield Cof E Primary School has been included in the assessment of Thruxton Village, but not in the assessment for Fyfield. This is clearly an error as the school is equal distance from the centre of Fyfield as it is for Thruxton.
  - Sports Facility – The Andover Aikido Club is located at Fyfield. This has not been included in the assessment and clearly should be as it provides a sports facility.
  - Other facilities – Having regard to the criteria at Table 5: There is a mobile post office within 1 mile at The Hillier Garden Centre. There are two bus services serving Fyfield operated by Congo – an on demand service. Fyfield has Superfast Broadband.
- 2.10 With these adjustments, we consider the assessment at Table 7 can be corrected as follows:

Fyfield Village	Primary School	Shop	Sports Facility	Community Facility	Total Facilities	Other Facilities	Draft Settlement Hierarchy Tier
LPA	0	0	0	1	1	1	4
Pro Vision	1	0	1	1	3	3	3

2.11 The neighbouring village of Thruxton is scored by the Council as follows:

Thruxton Village	Primary School	Shop	Sports Facility	Community Facility	Total Facilities	Other Facilities	Draft Settlement Hierarchy Tier
LPA	1	0	1	1	3	4	3

2.12 As such, there is presently a difference of just 1 point between Fyfield and Thruxton. However, we note that the village of Vernham Dean has the same school as Fyfield (as amended), and is a Tier 3 settlement. Similarly Ampfield has a total of 3 existing facilities and 2 other facilities (one less than Fyfield) and is a Tier 3 Settlement.

2.13 As such, there is an inconsistency in the Council's Settlement Assessment and justification that Fyfield should be reclassified as a Tier 3 Settlement.

2.14 This would be consistent with Paragraphs 82 and 83 of the Framework which state:

*"82. In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs, including proposals for community-led development for housing. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.*

*83. To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby."*

2.15 In summary, reclassifying Fyfield as a Settlement would promote sustainable development in this rural area and help to maintain the viability of this community. Further, development in Fyfield can help to sustain the services in the nearby villages of Kimpton and Thruxton consistent with the Framework.

### 3.0 Land to the rear of The Wayne – concept for sustainable development

- 3.1 Our client's land is in agricultural use. The site includes agricultural buildings in the southwest corner of the site where Prior Approval (PA) has been granted for the change of use of the agricultural barns to provide five dwellings<sup>1</sup>.
- 3.2 The site lies in a sustainable location on the edge of the existing village of Fyfield and within easy reach of the facilities and services in the larger village of Thruxton, and the Town Centre of Andover. It also has good access to the A303.
- 3.3 The site immediately adjoins the southern edge of the settlement policy boundary and therefore represents a logical extension of the settlement boundary. As discussed in section 2, we consider that the housing need should increase to help meet affordable housing needs, and the plan period should also be extended to achieve the necessary minimum 15 years from adoption. This means that there is a need to find further sites for allocation.
- 3.4 We consider that the Settlement Hierarchy assessment for Fyfield is incorrect and fails to account for existing key facilities i.e. the Kimpton, Thruxton and Fyfield Cof E Primary School which has been included in the assessment for Thruxton but excluded in the assessment for Fyfield despite the school being equal distance from both village centres. There is a clear justification to reclassify Fyfield as a Tier 3 settlement.
- 3.5 The only reason that the Land to the Rear of the Wayne was excluded from the Site Selection Process (at Stage 4) was due to this settlement classification. If the settlement is reclassified, it would be appropriate to reassess the merits of making an allocation at The Wayne which could contribute to the Council's windfall allowance and additional housing need.
- 3.6 Further, the Council propose to allocate c.15ha of Land at Thruxton Aerodrome for employment use. Clearly whilst some of the future workforce would choose to live in Andover, where a significant proportion of the housing requirement for North Test Valley is proposed, some would prefer to live within 2 miles of their place of work in a village location which provides a differing quality of life from urban living.
- 3.7 In summary, there is a clear case to allocate our clients land at The Wayne.

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<sup>1</sup> LPA reference 22/01070/PDQN

- 3.8 The site lies outside of the Fyfield Conservation Area, and there are no listed buildings adjacent to the site. Public right of way 095/1/1 lies adjacent to the northeast and southeast boundaries of the site, but is separated by a vegetation belt consisting of hedging and trees. This boundary screening could be enhanced further to ensure that the character and experience of public rights of ways users is protected and enhanced.
- 3.9 The site is within Flood Zone 1 and is therefore at lower risk of flooding. Also, according to the Environment Agency online Flood Maps, the site is at a very low risk of surface water flooding. Initial drainage assessments show that suitable surface and foul water drainage could be achieved.
- 3.10 Initial highways assessments have shown that public highway access to the site through The Wayne site is suitable for 65-130 dwellings. The site currently has an established access from Walnut Tree Ground, this has been deemed unacceptable as the main point of access to the site, but could usefully provide a dedicated link for pedestrians and cyclists and a secondary access for emergency services.
- 3.11 The 2023 SHELAA sets out that the site can accommodate 65-130 dwellings. The site can provide affordable homes and a mix of dwellings sizes to meet housing need within the borough.
- 3.12 The Illustrative Sketch Plan in Appendix A shows one way in which 70 dwellings could be achieved on site. However a higher density development could provide a higher number of dwellings on the site, and similarly a lower density development would achieve a lower yield. Our client is willing to collaborate with the Council to achieve a positive development for Fyfield and the Borough, and is willing to bring forward the site in phases to meet local needs.
- 3.13 The site is suitable, available and achievable for housing development, as well as being deliverable in full within the 15 year plan period. The site is in single ownership. There are no significant infrastructure requirements that would be expected to delay delivery. This has been demonstrated by the granting of the Prior Approval application.
- 3.14 Our client is keen to bring forward as a first phase a small scheme which might deliver c. 15 units in addition to the Class Q Prior Approval. This scheme importantly could provide affordable housing in response to local needs. The wider scheme could also provide further affordable housing, but also has the potential to deliver additional community facilities including a play area and recreation space.

- 3.15 In conclusion, Fyfield is a suitable location for development and contains sufficient existing facilities which should enable its categorisation as a Tier 3 settlement. There is significant additional employment land proposed in the area, but limited housing growth. Not everyone wants to live within the town, and whilst Andover rightly should be the focus of growth, the rural settlements have an important role to play. Fyfield village is less than 2 miles from a strategic employment allocation, and therefore well placed to accommodate a small allocation of c.70 dwellings to be delivered in phases over the 15 year plan period.
- 3.16 The land at The Wayne is a suitable site, and free of constraint. An allocation here should seriously be explored for the draft plan and we are continuing to gather survey information to assist the LPA, and are willing to work with the LPA collaboratively to bring the land forward to meet housing needs.

## 4.0 Conclusion

4.1 These representations have been prepared by Pro Vision on behalf of Cambium Developments Ltd in response to the consultation on the *'Draft Test Valley Local Plan 2040 Regulation 18 Stage 2'*.

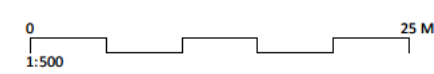
4.2 We consider that modifications to the plan are necessary to make the eLP sound. These include:

- Extending the plan period to at least 2041 to meet the requirement of the Framework;
- Uplifting the housing requirement by at least 550dpa to accommodate the additional 1 year to 2041;
- Reviewing the SHMA evidence in respect of affordable housing need in line with the Framework and uplifting the housing requirement to 730dpa;
- Reviewing the settlement hierarchy, and classifying Fyfield as a Tier 3 Settlement;
- Allocating the land at The Wayne for residential development of c. 70 dwellings to be delivered in phases.

4.3 We trust that these representations are helpful and would be happy to discuss them further or clarify any matters with the Council if required.

## Appendix A – Land to the rear of The Wayne Illustrative Sketch Layout





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The plan shown here is for the purpose of supporting a planning application only. Only valid from this drawing for the purpose of determining a planning application. Do not scale from this drawing for construction purposes.  
The proposed development is a subject to be made by separate consultation, and to be made in accordance with all relevant specialist drawings and information where available. Any discrepancy between this and any other consultant's drawings and information should be reported to the Vision immediately.



ISSUE	DATE	DESCRIPTION	DRAWN	CHECKED
1	27.03.24		ADD	ADD

CLIENT:	Cambium Developments Ltd.		
PROJECT:	Fyfield, Hampshire		
DRAWING:	Sketch Layout	1:500	
NUMBER:	51534-XX-S1-05	A1	
ISSUE:	v1	27.03.24	